Comment on WT Docket No. 16239

The petition field by New York University regarding the Alleged Violation of 97.113(a)(4).

As Amateur Extra Class Operator with nearly 60 years experience in amateur radio, I am puzzled why the petitioner, identified as "New York University" has any standing at all this matter. The university as non-profit corporation does not hold an amateur radio operator's license. Furthermore, the university's petitioners identified as doctoral level professors, have no standing in the daily operations of amateur operators throughout the world, where these digital modes are used successfully 24/7.

It seems to me that if the petitioners' assertions are correct, then the Commission should also ban Continuous Wave (CW) as not everyone has the skill to operate in this mode. In fact, often times automated code readers cannot read CW because of the speed or an operator "swing" in his or her sending. This transmission, however is quite readable to a skilled and experienced CW operator. As a result would CW be considered an encrypted transmission?

Radio Teletype with various BAUD rates has been around practically since the invention of the radio art. If a listener is not equipped with the proper RTTY decoding equipment, that also could be considered "encrypted."

If a radio operator is operating reduced-carrier Single Sideband (SSB) and the receiving station has only capability to full carrier AM, would that transmission be considered "encrypted?

If the radio operator were speaking in the Navajo language, with a legal ID in English every 10 minutes, would this voice transmission be considered "encrypted?"

It is my observation that the petitioner's reasons for making this request are highly suspect and have nothing to do with the enforcement of technical regulations of Part 97. There may be another agenda, which may profit New York University. I feel the FCC should carefully examine the motives of the petitioner because the assertions from a technical vantage point make no sense.

It has been my personal experience as an Emergency Management professional for over 40 years that WINLINK Technology and other digital modes such as MT63 have been invaluable for passing disaster radio traffic from the affected areas. These digital messages, especially on HF have been life savers. WINLINK is also critical to Mariners on the high seas for email communications when no other method is available.

Conclusion: The FCC should DENY the petition made by New York University.

Respectfully, Submitted,

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WENY-AM-FM Elmira,NY
WCOJ-AM- Coatesville, PA
WPWA-AM, Chester, PA
WNAK-AM-FM, Nanticoke & Carbondale, PA
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